

# INTERMOUNTAIN POWER SERVICE CORPORATION

December 10, 1996

Ursula K. Trueman, Director  
Division of Air Quality  
Department of Environmental Quality  
P.O. Box 144820  
Salt Lake City, Utah 84114-4820

Dear Director Trueman:

## Notice of Intent (NOI) to Modify Approval Order BAOE-672-89

This letter is our Notice of Intent to modify Approval Order #BAQE-672-89 for the Intermountain Power Generating Station (IGS) coal fired steam-electric plant located in Millard County. Specifically, Intermountain Power Service Corporation (IPSC) intends to trial burn subbituminous coal to determine burn characteristics and performance parameters in preparation for future continuous use of this type of coal. If the trial burns are acceptable, IPSC may decide to use this type of coal on a permanent basis. Section 4 of the Approval Order requires a notice of intent to modify if coal other than bituminous is proposed for use.

As required by Utah Administrative Code R307-1-3.1.6, the following information is provided:

- A. IGS is a fossil-fuel fired steam-electric generating station using coal as fuel for the production of steam.

IGS has bulk handling equipment for unloading, transfer, storage, preparation and delivery to the coal boilers. No changes in equipment are required or expected.

With the exception of fuel, no changes in the use of raw materials are required or expected.

The type of fuel will change from bituminous to subbituminous coal for several trial periods from January through September of 1997. Two types of subbituminous will be tested from different mines. Approximately 100,000 tons of subbituminous coal from Mine 1 and 300,000 tons from Mine 2 will be burned during this trial period. These subbituminous coals will be blended with bituminous coal at various ratios. Comparisons between these fuels are described below:

<u>Parameter*</u> <u>(Proposed)</u>	<u>FUEL TYPE</u>		
	<u>Bituminous (Present)</u>	<u>Subbituminous</u>	
		<u>Mine 1</u>	<u>Mine 2</u>
Moisture %	8.23	26.50	16.72
Ash %	9.42	5.26	5.76
Sulfur %	0.49	0.22	0.38
BTU/lb	11743	8800	10461

\*Proximate Analysis Calculated Composites, As Received Basis

- B. The expected composition and physical characteristics of emissions resulting from the use of subbituminous coal as fuel are expected to be unchanged from present emission composition and characteristics with regard to emission rates, temperature, air contaminant types and concentration of air contaminants. Subbituminous coal has lower thermal energy per pound than bituminous coal, requiring more tonnage of subbituminous coal to be combusted to meet comparable heat input. The mass flow of chimney effluent will increase proportionately with increased fuel usage and combustion air to meet comparable heat input.
- C. Present pollution control equipment for combustion includes dual register low NOx burners, baghouse type fabric filters for particulate removal and flue gas desulfurization scrubbers. Dust collection filters are the control equipment for handling and transfer of solid fuel. No changes in the operation of pollution control equipment are required or expected.

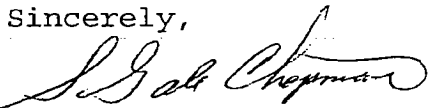
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- D. The present emission point for IGS boilers is a lined chimney that discharges at 712 feet above ground level (5386 feet above sea level). The chimney location is 39° 39' 39" longitude, 112° 34' 46" latitude.
- E. Emissions from boiler combustion are continuously sampled and monitored at the chimney for nitrogen oxides, sulfur oxides, carbon dioxide and volumetric flow. Opacity is measured at the fabric filter outlet. Other parameters recorded include heat input and production level (megawatt load). Monitoring will remain unchanged.
- F. Operation at IGS is 24 hours per day. This will not change.

Overall, there does not appear to be any potential for net increases in air contaminants from the proposed change. Operational parameters, including pollution control and production levels, will remain the same. The intent of the NOI is to allow IPSC to burn subbituminous coal as well as bituminous coal on a permanent basis.

If you have any questions or require further information, please have your staff contact Mr. Stan Smith at (801) 864-6430.

Sincerely,



S. Gale Chapman  
President & Chief Operations Officer

BI RJC:lbm

cc: Lynn Banks  
George Cross  
Chuck DeVore  
Blaine Ipson  
Aaron Nissen  
Stan Smith